



**Livestock and Seed Program  
Audit, Review, and Compliance Branch  
Quality System Audit Report**

**AUDIT INFORMATION**

<b>Applicant Name:</b>	Department of Plant Industry - Clemson University
<b>Est. Number:</b>	N/A
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<b>Phone Number:</b>	864-646-2131
<b>Auditor(s):</b>	David J. Hildreth
<b>Program:</b>	USDA National Organic Program (NOP)
<b>Audit Date(s):</b>	July 11, 2007
<b>Audit Identifier:</b>	NP7120ACA
<b>Action Required:</b>	No
<b>Audit Type:</b>	Corrective Action Audit
<b>Audit Objective:</b>	To verify that corrective actions adequately address the non-compliances identified during the Accreditation Renewal Audit.
<b>Audit Criteria:</b>	7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000; Updated September 11, 2006
<b>Audit Scope:</b>	Submitted corrective actions
<b>Location(s) Audited:</b>	Desk

Department of Plant Industry (DPI) - Clemson University submitted corrective actions on June 18, 2007, to the NOP and the auditor of record received the corrective actions from the NOP on June 27, 2007.

**FINDINGS**

The submitted corrective actions adequately addressed the three non-compliances identified during the Accreditation Renewal Audit.

**NP7120ACA.NC1 – Adequately Addressed** - NOP §205.300 (c) states, “Products produced in a foreign country and exported for sale in the United States must be certified pursuant to subpart E of this part and labeled pursuant to this subpart D.” *Product received by a seed company received a certificate from a foreign supplier and the certificate stated the seeds were certified to IFOAM and the EU 2092/91 Standards not to the NOP Standards. The seed company had repacked this product and labeled it as organic.* **Corrective Action:** DPI Certification Manager requested the company to stop selling products from that supplier. The client requested and received an updated certificate stating the seeds were



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certified organic according to the NOP. The Certification Manager of DPI will examine each organic certificate to ensure that the company has been certified to the NOP standards.

**NP7120ACA.NC2 – Adequately Addressed** - NOP §205.303 (b)(2) states, "On the information panel, below the information identifying the handler or distributor of the product and preceded by the statement, "Certified organic by \*\*\*, " or similar phrase, identifying the name of the certifying agent that certified the handler of the finished product and may display the business address, Internet address, or telephone number of the certifying agent in such label." *Seed packets produced by a seed company certified by DPI did not contain the statement "Certified organic by DPI, Clemson University". Also the company had ads in their catalog advertising organic seeds and displaying the USDA Organic seal, which did not contain the required statement identifying the certifying agent.* **Corrective Action:** The client has added the certifiers name to the catalog and is working on adding the certifiers name to the seed packets. DPI Certification Manager will review all materials used by the clients for promotion and sales to ensure proper use of the certifier's name.

**NP7120ACA.NC3 – Adequately Addressed** - NOP §205.403 (e)(2) states, "A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent." *The program manager stated that he does not send copies of the inspection report to the inspected operation.* **Corrective Action:** The Certification Manager stated that inspection reports were sent to all clients. A checklist has been developed for use to ensure no step in the certification process is skipped.